

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Case Number: 9:24-cv-80281-DMM**

Romeo Chico, individually and on behalf of
others similarly situated,

Plaintiff,

v.

General Motors LLC, OnStar LLC, LexisNexis
Risk Solutions, Inc.,

Defendants.

Class Action Complaint

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant LexisNexis Risk Solutions Inc. (“LNRS”), by counsel, moves the Court for an Order extending the time in which LNRS has to respond to Plaintiff Romeo Chicco’s Complaint up to and including May 6, 2024.

1. The Complaint in the above-captioned matter was filed on March 13, 2024. (Dkt. No. 1.)

2. On or about March 14, 2024, LNRS was served with the Complaint and Summons. (Dkt. No. 6.)

3. LNRS’ response to the Complaint is currently due on April 4, 2024. *See* Fed. R. Civ. P. 12(a)(1)(A)(i).

4. The undersigned counsel was recently retained to represent LNRS. LNRS is requesting a 30-day extension of time for it to respond to the Complaint to enable it to make a thorough investigation and analysis of the Complaint and to prepare an appropriate response. The

fact investigation in this case will require significant time and effort given Plaintiff's Complaint is a putative nationwide class action.

5. Additionally, since the filing of the Complaint, five other putative class actions have been filed against LNRS, General Motors and OnStar, thus necessitating further fact investigation and additional time to develop an appropriate response to Plaintiff's Complaint.

6. LNRS seeks up to and including May 6, 2024 to respond to Plaintiff's Complaint.

7. Counsel for Plaintiff, General Motors LLC ("GM"), and OnStar LLC ("OnStar") have stated that they consent to the relief sought in this motion.

8. The request is being made in good faith and not for the purposes of delay.

9. The requested extension of time shall not prejudice Plaintiff nor will this extension delay the Court as this action is in its earliest stages.

10. This is the first request by LNRS seeking such extensions.

11. Good cause for this request has been fully set forth herein, and no brief in support is required pursuant to Southern District Local Rule 7.1(a)(1)(J).

WHEREFORE, LNRS respectfully requests that the Court enter an Order providing LNRS with an extension of time up to and including May 6, 2024 to file a response to Plaintiff's Complaint.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Pursuant to Local Rule 7.1(a)(3), counsel certifies that counsel for movant has conferred with all parties who may be affected by the relief sought in a good faith effort to resolve the issues raised in this motion and the parties consent to the relief request in this Motion.

Dated: April 1, 2024

WE ASK FOR THIS:

By: /s/ Andrew D. Atkins
TROUTMAN PEPPER HAMILTON SANDERS LLP
301 S. College Street, 34th Floor
Charlotte, NC 28202
Florida Bar No. 92689
Telephone: 704-916-1504
E-mail: andrew.atkins@troutman.com

Counsel for Defendant LexisNexis Risk Solutions Inc.